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October 20, 2023

Via Electronic Filing

The Honorable Vera M. Scanlon, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Almonet v. Bermeo Food Corp. et al*
Case No.: 22-cv-06048

Dear Honorable Magistrate Judge Scanlon:

This law firm represents Plaintiff Cosmelina Almonte (the “Plaintiff”) in the above-referenced matter. This letter is submitted jointly with counsel for Defendants Bermeo Food Corp., Nelson Bermeo, Arturo Bermeo, and Suheidi Garate (collectively, the “Defendants”).

Pursuant to Your Honor’s Individual Motion Practice Rules, and the directives contained in Your Honor’s October 16, 2023 Order, this joint letter respectfully serves to provide the Court with a status update in the above-referenced matter.

Following the last status letter filed on September 13, 2023, the undersigned has contacted counsel for Defendants on five (5) separate instances, to obtain updates regarding Defendants’ continued desire to negotiate a global settlement. Mediator Kreitman has sent nine (9) follow-up emails to Defendants following the last status letter filed on September 13, 2023.

On October 20, 2023, Defendants’ counsel represented in writing that he is scheduled to meet with his client, Nelson Bermeo, next Thursday (10/26), to discuss the possibility of a resolution in this matter. Defendants’ counsel also represented in writing that he “[is] facing a conflict of interest[,]” and that he “might need to discontinue one case[,]” referring to his joint representation of individual defendants Nelson Bermeo and Suheidi Garate. Defendants’ counsel also wishes to advise the Court that Suheidi Garate’s husband “wishes to join the suit.”

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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